

REMARKS

Claims 1-2, 4-16, 18-24 and 26-35 are presented for examination, of which, claims 1, 15, 23, 34 and 35 are written in independent form.

Applicants have amended claim 35. Support for the amendment can be found in the originally-filed specification, *e.g.*, at FIG. 1 and the description thereof.

Rejections under 35 U.S.C. § 112

The Office action rejects claim 35 under 35 U.S.C. § 112, ¶1 as failing to comply with the written description requirement. As an initial matter, Applicants thank the Examiner for withdrawing all but one aspect of the rejection in light of Applicants' prior response.

The Office action argues that the specification does not disclose that "[g]ateways... belong[] in plurality to one single data processor." (Office action, p. 2) To advance prosecution, Applicants have amended claim 35 to read that the system comprises "a plurality of switching systems each comprising a media gateway associated with the network carrier." This feature is disclosed explicitly in FIG. 1 and the description thereof. Applicants respectfully request that this rejection be withdrawn.

Rejections under 35 U.S.C. § 103

The Office action rejects claims 1-2, 4-16, 18-24 and 26-35 as unpatentable over U.S. Patent No. 6,421,727 (Reifer et al.) in view of Applicant's alleged admitted prior art (APA). Applicants respectfully disagree with the conclusion of unpatentability.

All of the independent claims recite, in one form or another, downloading a call service component in response to a network carrier turning on a new service that corresponds to a call service component. The Office action argues that "downloading a call service component to a call controller ...in response to a network carrier action" is disclosed in the Reifer et al. patent at col. 9, lines 7-28, which reads:

FIG. 9 is a diagram which illustrates the SPNet system of the present invention. In accordance with the present teachings, a browser at the Service Provider's

location is used to download a JAVA application which, when executed, provides for service provisioning including service activation, suspension, reactivation and deactivation for telephone, paging, roaming and other services from a database at the GBS.

The SPNet Server supports the SPNet Client, the QSSI, and the VSP applet. The SPNet Server is modified to support SSL security and additional VSP methods. The VSP applet is a lightweight version of the SPNet Client. It provides SSL security, public validation methods, and provides add customer and add contract methods. The JAVA script provides the mechanism to execute methods on the VSP applet. The HTML page provides the form for the end user to fill in the acts as a holder for the JavaScript and VSP applet. Finally, the Browser provides a mechanism for end users to travel to the GBS Web Site, load the HTML page, and execute JavaScript or Java commands.

Applicants respectfully disagree with the Office action's characterization of this disclosure. This passage describes a user operating a web browser to download a JAVA application that provides for "service provisioning." In contrast to the instant claims, the cited passage does not point to any "downloading ...in response to a network carrier action." Even if the JAVA application of the Reifer et al. patent corresponds to the claimed "call service component," it is not downloaded in response to anything done by the *network carrier*. Instead, it is clear that the Reifer et al. patent describes a *user* who initiates downloading of the JAVA application. (*See, e.g.,* Reifer et al. col. 9:40-67, describing a how a user configures a web browser for using the SPNet JAVA application; col. 10:9-27, describing how a Service Provider uses a web browser logon to SPNet and connect with a gateway).

The Office action does not point to any disclosure in the cited art that a "call service component" is downloaded in response a network carrier turning on a new service that corresponds to the call service component. Accordingly, the cited art fails to disclose or render obvious the claimed subject matter. Applicants respectfully request allowance of claims 1-2, 4-16, 18-24 and 26-35.


Conclusion

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

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Respectfully submitted,

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